1. Introduction

This recruitment privacy notice ("Privacy Notice") explains what personal data (information) we collect about you in connection with our recruitment process, how we hold and use it, how we may share information about you and your rights in relation to your personal information, including the right to object to the processing. We are required to provide you with this information under data protection and privacy legislation. Please ensure that you read this Privacy Notice and any other similar notice or policy we may provide to you from time to time when we collect or process personal information about you.

This Privacy Notice applies to the recruitment activities of all companies owned directly or indirectly by Supporting Education Group, including where relevant, internal recruitment activities. Currently, this includes:

Company Name	Address
Supporting Education Group	5th Floor, 98 Theobalds Road, London, WC1X 8WB
Best Practice Network	Newminster House, 27-29 Baldwin St, Bristol, BS1 1LT
Eden Training Solutions	Wallace House, 4 Falcon Way, Welwyn Garden City AL7 1TW
Fleet Education Services	3rd Floor, Abbey House, 282 Farnborough Road, Farnborough, Hampshire GU14 7NA
Judicium Education	5th Floor, 98 Theobalds Road, London, WC1X 8WB
LMP Group	5th Floor, 98 Theobalds Road, London, WC1X 8WB
Neo People Management	Kernow House, Suite 6, The Pavilions, Bridge Hall Lane, Bury, BL9 7NX
Protocol Education	5th Floor, 98 Theobalds Road, London, WC1X 8WB
School Business Services	Suite 22, Discovery Court, Wallisdown Road, Poole, Dorset, BH12 5AG
Teaching Personnel	Wallace House, 4 Falcon Way, Welwyn Garden City AL7 1TW
Thrive Approach	The Quadrangle, 1 Seale Hayne, Newton Abbot, Devon, TQ12 6NQ

(each a "Supporting Education Group company") and references to "we", "us" and "our" in this notice are to the relevant Supporting Education Group company.

2. Data Protection Officer (DPO)

We have appointed a data protection officer ("DPO") to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact us or our DPO using the contact details below:

Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB

Email: dataservices@judicium.com

Tel: 0345 548 7000 (option 1, then option 1 again)

3. Who collects the information

Each Supporting Education Group Company is the 'data controller' and where applicable, gathers, shares and uses certain information about you in line with this Recruitment Privacy Notice. A data controller is the entity which determines the purposes for which and the manner in which your personal information is processed.

4. About the personal information we collect and process

The table set out in Part A of the Schedule below summarises the personal information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared. The table in Part B of the Schedule below summarises the additional personal information we collect and hold before making a final decision to recruit (i.e. before making an offer of employment unconditional), how and why we do so, how we use it and with whom it may be shared. We also use cookies and similar technologies in relation to our online recruitment activities and you should refer to our Cookie Policy for further information which is available on our website, https://www.supportingeducation.com/.

5. Where information may be held

Personal information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents.

6. Automated decision-making

We do not use your personal information to make automated decisions about you which have a legal or similarly significant effect on you.

7. If you fail to provide personal information

If you fail to provide information when requested, where this information is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further. However, when we rely on your consent to collect your personal information and you select not to provide such information, this will not affect your application with us in any way. If we rely on your consent or if any information we request during your application process is optional, we will let you know at that point.

8. How long we keep your information

We will normally retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our applicable data retention policy, please contact **dataservices@judicium.com** for further information.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your consent to retain your personal information for a fixed period, usually two years, on that basis.

9. Your rights in connection with personal information

By law you have the following rights in relation to your information.

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a confirmation of whether we hold your personal information and if so, to also receive a copy of that personal information and certain information about how we use it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Please note that this is not an absolute right and that we will be able to retain certain information where we have a legitimate legal ground to do so.
- Object to processing of your personal information where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request that we provide certain details of your personal information in a "portable" format (e.g. in a pdf or .csv file) and that we transfer this to another party.
- Withdraw your consent for processing of your personal information (where we rely on your consent) at any time. However, if you withdraw your consent, this will not affect the lawfulness of any processing of your personal information carried out prior to the withdrawal of your consent.
- Complain to a supervisory authority. You have the right to make a complaint at any time to your local supervisory authority for data protection issues (see the section below entitled 'How to complain').

Please note these rights may be limited, for example if fulfilling your request would reveal personal data about another person or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. We will inform you of the relevant exemptions upon which we rely when responding to any request you make.

If you want to exercise any of your data protection rights, please contact the DPO in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

10. Sharing your personal information with third parties

Your personal information will primarily be accessed by our employees who are involved in your recruitment process, our HR, IT, finance and facilities departments, to the extent it is necessary for them to fulfil their tasks in relation to your application. We also share personal information with other Supporting Education Group companies, when necessary in relation to the application process and with third parties as we describe below:

a) To process your application, to enable appropriate checks and aptitude tests to be carried out, and to facilitate and undertake recruitment activities on our behalf. For example, we work with third parties such as Predictive Index and Peoplewise to help us carry out psychometric and cognitive testing, LinkedIn and Indeed for recruitment advertising and Sage for application tracking. We may also contact your referees

to confirm your work history. We also use third-party service providers, such as IT system and technology application providers, to process and store your personal information;

b) In line with our Privacy & Cookie Policy (which is available on our website, https://www.supportingeducation.com/), we engage third-party service providers to help us monitor website performance, utilisation of features and services, traffic and demographic trends, and browser versions, to improve our website and services and tailor them to your interests;

c) We share information with our business advisors, such as legal advisors or business/ recruitment consultants, to the extent it is necessary for them to provide us with their services;

d) We may share information with regulatory and government authorities and/or law enforcement agencies if required by law or if necessary for the legal protection of our legitimate interests in compliance with applicable laws;

e) In the event that our business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser and passed to the new owners of the business;

f) We may share information for the purposes of company reporting and analysis.

g) We may work with Avvanz to complete background checks as part of the recruitment process. They can only process such information under our written instructions as specified within a contract we have with them. Where necessary, we may share personal data outside of the UK to seek further support with certain vetting checks. This is only permitted where we rely upon your consent or have an international data transfer agreement, with appropriate safeguards, in place to meet statutory requirements.

When we engage third-party service providers, we require that they take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

11. Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available on request.

12. How to complain

We hope that our DPO can resolve any query or concern you raise about our use of your information.

For further information about your rights or how to make a formal complaint, in the first instance, please contact us using the contact details at the top of this privacy notice.

If you remain unhappy with how your complaint has been addressed, you can also complain the Information Commissioner using the following details:

Address: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: (+44) 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

13. About the information we collect and hold

Part A – Up to and including the shortlisting stage of the recruitment process

The information we collect	How we collect the information	Legal basis	Why we use and may share the information
Your name, contact details (for example address, phone number, email address) and details of your work history (for example your CV)	From you	1. To be able to contact you and progress your application and to make an informed recruitment decision (our legitimate interests). 2. To enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so. 3. We rely on your consent to contact you and inform you of career opportunities.	• To enable the People team or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome. To inform the relevant manager or department of your application. • To keep you informed of opportunities which may be of interest, if you agree to this. • To engage with third parties that provide services to us for the recruitment process such as background checks and screening assessments.
Details of your qualifications, experience, CV, employment history including job titles, salary, notice period, and working hours and interests (if you provide us with this information)	From you, in the completed application form, CV and interview notes (if relevant)	1. To make an informed recruitment decision (our legitimate interests). 2. To enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so.	• To enable the People team or hiring managers in the relevant department to evaluate your application and make informed recruitment (shortlisting and hiring) decisions.
Diversity information, including information about your ethnic background, religious beliefs, disabilities and health conditions, sexual orientation, as part of our equal opportunities form (to the extent legally permitted)	From you in your completed application form, telephone and in-person interview notes, and from relevant aptitude testing	1. To make an informed recruitment decision (our legitimate interests). 2. To enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so.	• To enable the People team or hiring managers in the relevant department to evaluate your applications and make informed recruitment (shortlisting and hiring) decisions. • We may use third parties to carry out such pre -screening activities on our behalf.
Information regarding your criminal record (e.g. DBS checks) Note: that we only collect this information where the role requires it.	From our provider carrying out criminal record checks	For reasons of substantial public interest to prevent or detect unlawful acts.	• Used to make an informed recruitment decision.

The information we collect	How we collect the information	Legal basis	Why we use and may share the information
Details of your referees	From your completed application form	To make an informed recruitment decision (our legitimate interests).	• To carry out a fair recruitment process, verify your employment and educational background and make an informed recruitment decision. • Information shared with relevant managers, HR personnel and the referee.
Details about disability status and health	From your completed application form, medical questionnaire, interview, or otherwise from you directly	To comply with our legal obligations to make reasonable adjustments	• To carry out a fair recruitment process and where necessary, make reasonable adjustments to facilitate the interview process. • Information shared with relevant managers, the People team or other SEG employees who participate in the interview process.
Video and audio recording of remote interviews	From you during video and telephone interviewing	When our providers of recruitment services carry out remote interviews (and recruitment activities e.g. skill-based tests) on our behalf, we record these interviews on the basis of our legitimate interests to effectively manage the recruitment process.	• Be able to review interviews which you have given remotely to our providers of recruitment related services and to make an informed decision in relation to your application.
Any of the above information	From you and where relevant, from the requesting public authority	To comply with our legal obligations, to the extent we are obliged under law to process requests for disclosure of information. Our legitimate interests to assist investigations carried out by official authorities. Our legitimate interests to protect our legal rights	• To respond to legitimate requests for the disclosure of information, made by public authorities, law enforcement or governmental bodies or under a court order. • To respond to complaints, to protect our legal rights and to establish, exercise or defend legal claims relating to our recruitment process • To engage with third parties that provide services to us for the recruitment process such as background checks and screening assessments.

Part B – Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, from references obtained about you from previous employers and/or education providers (if you provide us with them)	From your referees (details of whom you will have provided)	To make an informed recruitment decision (our legitimate interests).	• To verify the information you have provided and to verify your academic and/or employment history by contacting your referees, and to make an informed recruitment decision. • Information is shared with relevant managers and the People team.
Information regarding your academic and professional qualifications	From you, or where permissible, from your education provider, and/or from the relevant professional body	To make an informed recruitment decision (our legitimate interests). To enter into/perform a contract with you (the employment contract) and/or to take steps at your request prior to doing so.	• To carry out a fair recruitment process and to make an informed recruitment decision. • Information shared with relevant managers and the People team.
Information regarding your criminal record (DBS checks)	From you, our background screening provider and the Disclosure and Barring Service (DBS)	For reasons of substantial public interest, to prevent or detect unlawful acts.	• Used to make an informed recruitment decision and to take measures to prevent unlawful acts in our workplace. • Information is shared with DBS and similar regulatory authorities as required to carry out the checks.
Your nationality and immigration status and information from related documents, such as your passport, driving licence, VISA, national insurance number or other identification and immigration information – to the extent permitted by local law	From you and, where necessary, the Home Office	To comply with our legal obligations.	• To carry out right to work checks. • Information may be shared with the Home Office, where we have a legal obligation to do so.
Any of the above information	From you and where relevant, from the requesting public authority	To comply with our legal obligations, to the extent we are obliged under law to process requests for disclosure of information. Our legitimate interests to assist investigations carried out by official authorities. Our legitimate interests to protect our legal rights.	• To respond to legitimate requests for the disclosure of information, made by public authorities, law enforcement or governmental bodies or under a court order. • To respond to complaints, to protect our legal rights and to establish, exercise or defend legal claims relating to our recruitment process • To engage with third parties that provide services to us for the recruitment process such as background checks and screening assessments.